

Remarks

The claims were amended in accordance with the amendments above. The amendments to the claims are being made to focus the claims on those aspects of the invention which are a commercial priority of the assignee. The amendments are fully supported by the specification, claims, and figures as originally filed. No new matter is believed or intended to be involved.

Applicants note that they intend for the recited “display screens” to include a variety of types of displays, and that they do not intend for the recited “display screens” to be limited to LED displays. Applicants further note that this contemplation is evidenced by Applicants’ suggestion to use various image/video formats at p. 14, lines 3-8 of the present specification; and is further evidenced by Applicants’ incorporation by reference (at p. 20, ll. 19-23 of the present specification) of U.S. Patent No. 5,724,062, which discloses several types of displays at Col. 1, ll. 18-32, among other places. Accordingly, to the extent that Applicants have previously argued during prosecution of related applications that their invention claimed in those applications was directed to LED displays, Applicants expressly note that the invention claimed herein includes many other types of displays in addition to LED displays. Applicants further expressly disclaim herein any reliance on distinctions and arguments previously made regarding LED displays relative to the prior art. Accordingly, the term “display screen” or “display screens,” as recited in the present or future claims, should be interpreted as broadly as reasonably permitted by the disclosure, and not with regard to any argument or claim amendment made in related applications.

Claim 72 was rejected under 35 USC §101 for being directed to non-statutory subject matter. Claim 72 has been canceled, thereby obviating the rejection. Applicants further submit that the presently amended claims are directed to statutory subject matter in accordance with 35 USC §101.

Claims 72, 11-16, 31-33, 43, 47, 49-55, and 60-63 were rejected under 35 USC §102(e) as being anticipated by Walker et al. (U.S. Pat. 6,754,636). Claims 17, 30, 34, 41, 56-59, 64-65, and 73 were rejected under 35 USC §103(a) as being unpatentable over Walker et al. Claims 18-21 were rejected under 35 USC §103(a) as being unpatentable over Walker et al. in view of Reeder (U.S. Pat. 5,852,812). Claim 22 was rejected under 35 USC §103(a) as being

unpatentable over Walker et al. in view of Loban et al. (U.S. Pat. 5,612,741). Claim 23 was rejected under 35 USC §103(a) as being unpatentable over Walker et al. in view of Loban et al. and further in view of Margulis et al. (U.S. Pat. 6,157,396). Claims 69-70 were rejected under 35 USC §103(a) as being unpatentable over Walker et al. in view of Laumeyer et al. (U.S. Pat. 6,266,442).

Under MPEP 2131, a claim is anticipated under 35 U.S.C. §102 only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. The identical invention must be shown in as complete detail as is contained in the claim. In addition, the elements in the prior art reference must be arranged as required by the claim. MPEP 2131 (emphasis added).

In addition, Applicant notes that under MPEP 2143.03, in order to establish a *prima facie* case of obviousness, the prior art reference or combination of references must teach or suggest all of the limitations of a claim. A *prima facie* case of obviousness also requires that there be some teaching, suggestion, or motivation to modify the references either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. MPEP 2143.01. The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. MPEP 2143.01.

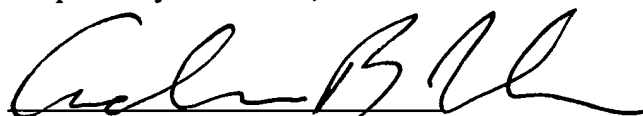
In light of the foregoing, Applicants respectfully submit that the art of record neither anticipates nor renders obvious the presently amended claims. In particular, the art of record, even in combination, fails to teach or suggest each and every element recited in each of the amended independent claims in accordance with MPEP 2131 and 2143. In addition, even if the combined art of record taught or suggested all of the elements of any of the amended independent claims, the art is devoid of any suggestion or motivation to modify or combine the teachings of the references in order to obtain the claimed invention.

To the extent that the amendments constitute a narrowing of the claims, such narrowing of the claims should not be construed as an admission as to the merits of the prior rejections.

Indeed, Applicants traverse the rejections and preserve all rights and arguments. In addition, Applicants reserve all rights with respect to arguments not explicitly made herein. Applicants further note that the dependent claims include additional limitations not taught or suggested in the art of record, thus forming independent basis for novelty and non-obviousness.

Based on the foregoing, all pending claims are in a condition for allowance. Accordingly, Applicants respectfully request reconsideration and an early notice of allowance. Should the Examiner wish to discuss the amendments or arguments made herein, Applicants invite the Examiner to contact the undersigned at (513)369-4811 or via e-mail at aulmer@fbtlaw.com.

Respectfully Submitted,



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